

INSPECTION NARRATIVE
FEBRUARY 08, 1990

Site:	
Break:	1.8
Other:	

CLARK BROS. WAREHOUSES
939 ROOSEVELT AVE.
ALBANY, GEORGIA 31701
TEL. (912) 435-7717

6648

ON THE 08TH DAY OF FEBRUARY 1990, AT THE REQUEST OF MR ANDY WILSON(EPA) I CONDUCTED AN INSPECTION AT CLARK BROS. WAREHOUSES IN ALBANY, GEORGIA. THE PURPOSE OF THIS INSPECTION WAS TO OBTAIN INFORMATION RELATING TO A SUSPENDED PESTICIDE PRODUCT(GRAIN FUMIGANT 2) THAT WAS STORED AT THIS FACILITY. I CONTACTED THE OWNER OF THE WAREHOUSE, MR JACK CLARK AND HE INFORMED ME OF THE SITUATION AT HAND. MR. CLARK SAID THAT THE PESTICIDE PRODUCT WAS STORED IN HIS WAREHOUSE ON JAN. 03, 1986 IN LIEU OF AN AGREEMENT HE HAD MADE WITH ICP CHEMICALS, PO BOX 156-LIDO BEACH, N.Y. 11561. ACCORDING TO MR CLARK THIS FIRM PURCHASED THE PRODUCT FROM GOLD KIST, INC. IN THOMASVILLE, GEORGIA AND NEEDED SOMEWHERE TO STORE THEM UNTIL THEY COULD FIND A BUYER. THE FIRM HAS MADE NO ATTEMPT TO CONTACT MR CLARK SINCE THEIR AGREEMENT FOUR YEARS AGO AND AS OF THIS DATE NO STORAGE FEES HAVE BEEN PAID. NUMEROUS ATTEMPTS HAVE BEEN MADE BY TELEPHONE AND MAIL TO CONTACT THE FIRM CONCERNING THE REMOVAL OF THE PESTICIDE PRODUCT FROM CLARK BROS. WAREHOUSE. ACCORDING TO MR. CLARK TELEPHONE CALLS WERE NEVER RETURNED, CERTIFIED LETTERS WERE ACCEPTED BUT NEVER ANSWERED.

DURING THE PAST TWO YEARS MR CLARK HAS DISCUSSED HIS PROBLEM WITH NUMEROUS EPA OFFICIALS FROM THE REGION IV OFFICE IN ATLANTA. ACCORDING TO MR CLARK THE GRAIN FUMIGANT 2 THAT IS STORED IN HIS WAREHOUSE WAS INSPECTED ON APRIL 5, 1988 BY MR DON RIGGER(EPA). PHOTOS WERE TAKEN OF THE PRODUCT AND A REPORT WAS TO BE MADE. INSPECTIONS HAVE ALSO BEEN CONDUCTED BY OFFICIALS FROM EPD IN RELATION TO THE GRAIN FUMIGANT 2 PESTICIDE ON PREVIOUS OCCASIONS.

AT THE TIME OF MY INSPECTION I DISCOVERED THAT THE PESTICIDE PRODUCT(GRAIN FUMIGANT 2) IS STORED IN A BLOCK BUILDING WITH A CONCRETE FLOOR. A VARIETY OF FERTILIZER NUTRIENT PRODUCTS AND SOME HOUSEHOLD APPLIANCES SHARE THE SPACE. NO FOOD OR FEED PRODUCTS WERE STORED IN THIS AREA. ALL OF THE GRAIN FUMIGANT 2

IS STORED ON PALLETS. THE FOLLOWING IS A BREAKDOWN OF CONTAINER SIZE AND QUANTITIES ON HAND AT THE TIME OF MY INSPECTION.

62/ 55 GALLON METAL DRUMS---A TOTAL OF 3410 GALLONS OF PRODUCT.

114/ 5 GALLON METAL CANS---A TOTAL OF 570 GALLONS OF PRODUCT.

102 CASES(6x1 gal. metal can per case)---A TOTAL OF 612 GALLONS OF PRODUCT.

THE 55 GALLON DRUMS APPEARED TO BE IN FAIR CONDITION ALTHOUGH CONSIDERABLE RUSTING IS OCCURRING AROUND THE SEAMS(SEE EXHIBIT J). THERE IS NO APPARENT LEAKING FROM THE DRUMS AT THIS TIME. THE 5 GALLON CANS ARE DETERIORATING AT A MORE RAPID PACE THAN THE DRUMS. SEVERE RUSTING IS TAKING PLACE AROUND THE SEAMS ON SOME OF THE CONTAINERS. DEFINITE LEAKAGE AND PRODUCT LOSS HAS OCCURRED IN AT LEAST TWO OF THE 5 GALLON CANS. ONE WAS SO BADLY RUSTED THAT A HOLE WAS VISIBLE IN THE TOP APPROXIMATELY 4 INCHES IN DIAMETER(SEE EX.I). THE 1 GALLON CANS WERE IN SEALED CASES. I OPENED A COUPLE OF THE CASES AND DISCOVERED THAT CONTAINER RUSTING WAS SEVERE. DEFINITE LEAKAGE AND PRODUCT LOSS HAS OCCURRED(SEE EXHIBITS E-F-G). THE CONDITIONS FOUND IN THESE TWO CASES OF 1 GALLON CONTAINERS MAY OR MAY NOT BE REPRESENTATIVE OF THE REMAINING SEALED CASES.

I DID NOT DISCOVER ANY EVIDENCE ON THE FLOOR AREA AROUND THE CONTAINERS THAT WOULD INDICATE PRESENT LEAKING AT THE TIME OF THIS INSPECTION. HOWEVER DUE TO THE WAY THE PRODUCT IS STACKED I WAS UNABLE TO VISUALLY INSPECT ALL AREAS OF THE FLOOR IN THE AREA.

SEVERAL LETTERS OF CORRESPONDENCE AND DOCUMENTS RELATING TO THE STORAGE OF THE GRAIN FUMIGANT 2 AND PHOTOGRAPHS(EXHIBITS A-J) ARE ATTACHED.

CONCLUSION:

EDWARD FOSTER
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